

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

In re: Joseph Bryce Dingman	)	
	)	
Audrey Winter,	)	
	)	
Plaintiff	)	Case No. 09-11961-RGM
	)	
vs.	)	Adv. No. 09-01165-RGM
	)	
Joseph Bryce Dingman,	)	
	)	
Defendant.	)	

**Reply to Motion to Continue Trial Date and Memorandum of Law**

Joseph Bryce Dingman, your Defendant, replies pursuant to Local Bankruptcy Rule 9013-1H and to the Plaintiff's Motion by stating as follows:

1. Defendant hired counsel, Brian Geno, on May 20, 2010, the same day that a reply to the instant motion was due, making a June 17, 2010 trial difficult.
2. Brian Geno learned on May 20, 2010 that Defendant JB Contracting was a party that he may need to also represent.
3. Brian Geno will likely not be able to prepare the necessary paperwork to enter his appearance and reply on behalf of JB Contracting, if at all, by the deadline.
4. Defendant Dingman does not oppose a continuance so that he can comply with discovery requests of Plaintiff.
5. To the extent that Plaintiff's motion suggests that Defendant Dingman has willfully refused to provide discovery, he states that he did not do so, but rather was uncertain how to proceed in light of his pro se status. He is able to respond appropriately at this time.

Wherefore, Defendant Dingman does not oppose the Plaintiff's continuance request.

Respectfully submitted,

/s/ David C. Jones, Jr.  
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/s/ Brian D. Geno  
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Counsel for Joseph Bryce Dingman

**Certificate of Service**

I certify this 20th day of May, 2010 that I delivered a copy of the foregoing by first class mail to Andrew L. Cole, at his fax which is 410-752-6868 and his office which is Franklin & Prokopik, The B&O Building, Two N. Charles Street, Suite 600, Baltimore, MD 21201.

/s/Brian D. Geno  
Brian D. Geno